Privacy Policy of Mobili Fiver

This Website collects some Personal Data from its Users.

Owner and Data Controller

Mobili Fiver S.r.l. Via O. Bottecchia 6 33087 Pasiano (PN) Italy P.IVA e C.F.: 01391580931

Owner contact email: privacy@mobilifiver.com

Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: phone number; first name; last name; physical address; country; email address; Trackers; Usage Data; device information; browser information; purchase history; billing address; Data communicated while using the service; payment info; coarse location; password; VAT Number; company name; Tax ID; ZIP/Postal code; city; house number; various types of Data; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; financial information; launches; number of sessions; session duration; scroll-to-page interactions; session statistics; page views; interaction events; page events; date of birth; IP address; app information; device logs; operating systems; language; geographic position; address; geography/region; positional information; state; province; county; latitude (of city); longitude (of city); metro area; shipping address; data relating to the point of sale; in-app purchases; invoicing information; product interaction; order ID; User ID; identification document.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website. Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, Managing contacts and sending messages, Remarketing and behavioural targeting, Advertising, Analytics, Tag Management, Handling payments, Interaction with support and feedback platforms, Platform services and hosting, Managing support and contact requests, Collection of privacy-related preferences, Interaction with live chat platforms, Location-based interactions, Registration and authentication, Registration and authentication provided directly by this Website, Displaying content from external platforms, Heat mapping and session recording, Interaction with online survey platforms, Interaction with data collection platforms and other third parties, Managing data collection and online surveys, Traffic optimisation and distribution, Spam and bots protection and User database management.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Advertising

This type of service allows User Data to be utilised for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Website, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioural retargeting technique, i.e. displaying ads tailored to the User's interests and behaviour, including those detected outside this Website. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Facebook Lookalike Audience (Meta Platforms Ireland Limited)

Facebook Lookalike Audience is an advertising and behavioural targeting service provided by Meta Platforms Ireland Limited that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behaviour to Users who are already in a Custom Audience list on the base of their past use of this Website or engagement with relevant content across the Facebook apps and services.

On the base of these Data, personalised ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of Trackers for ads personalisation by visiting this opt-out page.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Pinterest Ads (Pinterest, Inc.)

Pinterest Ads is an advertising service provided by Pinterest, Inc. that allows the Owner to run advertising campaigns on the Pinterest advertising network.

Users may opt out of behavioural advertising features through their device settings, their Pinterest personalization settings.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Pinterest Conversion Tag (Pinterest, Inc.)

Pinterest Conversion Tag is an analytics service provided by Pinterest, Inc. that connects data from the Pinterest advertising network with actions performed on this Website.

Users may opt out of behavioural advertising features through their device settings, their Pinterest <u>personalization settings</u> or by visiting the <u>AdChoices opt-out page</u>.

Personal Data processed: device information; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt out</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Google Ads conversion tracking (Google Ireland Limited)

Google Ads conversion tracking is an analytics service provided by Google Ireland Limited that connects data from the Google Ads advertising network with actions performed on this Website.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Google Ads Similar audiences (Google Ireland Limited)

Similar audiences is an advertising and behavioural targeting service provided by Google Ireland Limited that uses Data from Google Ads Remarketing in order to display ads to Users with similar behaviour to Users who are already on the remarketing list due to their past use of this Website.

On the basis of this Data, personalised ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising Trackers by going to: Google <u>Ad Settings</u>.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy – Opt Out.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- · a Sharing in California

Meta ads conversion tracking (Meta pixel) (Meta Platforms Ireland Limited)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms Ireland Limited that connects data from the Meta Audience Network with actions performed on this Website. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy – Opt out.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Microsoft Advertising (Microsoft Corporation)

Microsoft Advertising is an advertising service provided by Microsoft Corporation.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Hotjar Form Analysis & Conversion Funnels (Hotjar Ltd.)

Hotjar is an analytics service provided by Hotjar Ltd.

Hotjar honours generic Do Not Track headers. This means your browser can tell its script not to collect any of your data. This is a setting that is available in all major browsers. Find Hotjar's <u>opt-out information here</u>.

Personal Data processed: Trackers; Usage Data.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

TikTok conversion tracking (TikTok Inc.)

TikTok conversion tracking is an analytics and behavioural targeting service provided by TikTok Inc. that connects data from the TikTok advertising network with actions performed on this Website. The TikTok pixel tracks conversions that can be attributed to TikTok ads and enables to target groups of Users on the base of their past use of this Website.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information.

Analytics

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

Google Analytics 4 (Google Ireland Limited)

Google Analytics 4 is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting Google's official documentation.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: browser information; Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy – Opt Out.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Google Analytics (Universal Analytics) (Google Ireland Limited)

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited ("Google"). Google utilises the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

In order to understand Google's use of Data, consult **Google's partner policy**.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in the United States

Meta Events Manager (Meta Platforms Ireland Limited)

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on this Website.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Google Analytics (Universal Analytics) with anonymised IP (Google Ireland Limited)

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited ("Google"). Google utilises the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualise and personalise the ads of its own advertising network. This integration of Google Analytics anonymises your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy – Opt Out.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Collection of privacy-related preferences

This type of service allows this Website to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

iubenda Consent Database (iubenda srl)

The iubenda Consent Database allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.

In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; Trackers.

Place of processing: Italy – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

iubenda Privacy Controls and Cookie Solution (iubenda srl)

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information and in particular to the use of Cookies and other Trackers on this Website.

Personal Data processed: Trackers.

Place of processing: Italy – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

Contacting the User

Phone contact (this Website)

Users that provided their phone number might be contacted for commercial or promotional purposes related to this Website, as well as for fulfilling support requests.

Personal Data processed: phone number.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

• a Sale in California

Contact form (this Website)

By filling in the contact form with their Data, the User authorises this Website to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: country; email address; first name; last name; phone number; physical address.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

• a Sale in California

Mailing list or newsletter (this Website)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

Personal Data processed: country; email address; first name; last name.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

• a Sale in the United States

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Maps widget (Google Ireland Limited)

Google Maps is a maps visualisation service provided by Google Ireland Limited that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Usage Data.

Place of processing: Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Vimeo video (Vimeo, LLC)

Vimeo is a video content visualisation service provided by Vimeo, LLC that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

• a Sale in California

Font Awesome (Fonticons, Inc.)

Font Awesome is a typeface visualisation service provided by Fonticons, Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

· a Sale in California

YouTube video widget

YouTube is a video content visualisation service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information.

Flowbox

Flowbox is a service for sharing and using content created by users from Instagram, only with the user's consent.

The photos are published in the section of our website corresponding to the product to give customers an idea of its real uses or in

the gallery on our website. In some cases, they may also be published on one of our other channels such as Instagram or Facebook, in newsletters or in our social ads.

Handling payments

Unless otherwise specified, this Website processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Website isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data processed: billing address; email address; first name; last name; purchase history.

Place of processing: See the PayPal privacy policy – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; commercial information.

This processing constitutes:

• a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana

Scalapay

Scalapay è un servizio di pagamento fornito da Scalapay S.R.L., che consente all'Utente di effettuare pagamenti online a rate.

This processing constitutes:

Klarna (Klarna AB)

Klarna is a payment service provided by Klarna AB.

Personal Data processed: billing address; email address; first name; last name; various types of Data as specified in the privacy policy of the service.

Place of processing: Sweden – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

Payment by bank transfer (this Website)

In the event that the chosen payment method is a direct bank transfer to the current account indicated by this Website, the Owner will collect the payment details of the User, i. e. the current account number of the sender, the SWIFT code, the bank and the name of the sender. Such data will be collected and processed exclusively within the transaction and for billing purposes only.

Personal Data processed: first name; last name; payment info.

Category of Personal Information collected according to CCPA: identifiers; commercial information.

This processing constitutes:

Apple Pay (Apple Inc.)

Apple Pay is a payment service provided by Apple Inc., which allows Users to make payments using their mobile phones.

Personal Data processed: billing address; email address; first name; last name; payment info; phone number.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information.

This processing constitutes:

Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

Personal Data processed: email address; first name; last name; payment info; purchase history.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; commercial information.

This processing constitutes:

Google Pay

Google Pay is a payment service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, which allows users to make online payments using their Google credentials.

Personal Data processed: payment info; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: commercial information; internet information.

iDeal (Currence iDEAL B.V.)

iDeal is a payment service provided by Currence iDEAL B.V. which allows Users to make online payments.

Personal Data processed: financial information; Usage Data.

Place of processing: Netherlands – Privacy Policy.

Category of Personal Information collected according to CCPA: california Consumer Records Statute information; internet information.

American Express (American Express Company)

American Express is a payment service provided by American Express Company which allows Users to make online payments.

Personal Data processed: payment info; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: commercial information; internet information.

Scalapay (Scalapay S.r.l.)

Scalapay is a payment service provided by Scalapay S.r.l. that allows customers to pay in installments.

Personal Data processed: address; app information; billing address; browser information; city; clicks; coarse location; country; county; data relating to the point of sale; date of birth; device information; device logs; email address; first name; geographic position; geography/region; house number; identification document; in-app purchases; interaction events; invoicing information; IP address; keypress events; language; last name; latitude (of city); launches; longitude (of city); metro area; mouse movements; number of sessions; operating systems; order ID; page events; page views; payment info; phone number; physical address; positional information; product interaction; province; purchase history; scroll position; scroll-to-page interactions; session duration; session statistics; shipping address; state; Tax ID; Usage Data; User ID; ZIP/Postal code.

Place of processing: Italy – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; commercial information; internet information; geolocation data; inferred information.

Amazon Payments (Amazon)

Amazon Payments is a payment service provided by Amazon.com, Inc., which allows Users to make online payments using their Amazon credentials.

Personal Data processed: purchase history.

Place of processing: See the Amazon privacy policy – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: commercial information.

Heat mapping and session recording

Heat mapping services are used to display the areas of this Website that Users interact with most frequently. This shows where the points of interest are. These services make it possible to monitor and analyse web traffic and keep track of User behaviour. Some of these services may record sessions and make them available for later visual playback.

Hotjar Heat Maps & Recordings (Hotjar Ltd.)

Hotjar is a session recording and heat mapping service provided by Hotjar Ltd.

Hotjar honours generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's <u>opt-out information here</u>.

Personal Data processed: Trackers; Usage Data; various types of Data as specified in the privacy policy of the service.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Website for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Hotjar Recruit User Testers (Hotjar Ltd.)

The Hotjar Recruit User Testers widget is a service for interacting with the Hotjar data collection platform provided by Hotjar Ltd.

Hotjar honours generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's <u>opt-out information here</u>.

Personal Data processed: Trackers; Usage Data; various types of Data.

Place of processing: Malta – Privacy Policy – Opt Out.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Interaction with live chat platforms

This type of service allows Users to interact with third-party live chat platforms directly from the pages of this Website, in order to contact and be contacted by this Website's support service.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service. Moreover, live chat conversations may be logged.

Zendesk Chat (Zendesk, Inc.)

Zendesk Chat is a service for interacting with the Zendesk live chat platform provided by Zendesk, Inc.

Personal Data processed: email address; first name; Usage Data.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Interaction with online survey platforms

This type of service allows Users to interact with third-party online survey platforms directly from the pages of this Website. If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Hotjar Poll & Survey widgets (Hotjar Ltd.)

The Hotjar Poll & Survey widgets are services that enable interaction with the Hotjar platform provided by Hotjar Ltd. Hotjar honours generic "Do Not Track" headers. This means the browser can tell its script not to collect any of the User's data. This is a setting that is available in all major browsers. Find Hotjar's opt-out information here.

Personal Data processed: Trackers; Usage Data; various types of Data.

Place of processing: Malta – Privacy Policy – Opt Out.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Interaction with support and feedback platforms

This type of service allows Users to interact with third-party support and feedback platforms directly from the pages of this Website.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

Zendesk Widget (Zendesk, Inc.)

The Zendesk Widget is a service for interacting with the Zendesk support and feedback platform provided by Zendesk Inc.

Personal Data processed: country; email address; first name; last name; phone number; Trackers.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

• a Sale in California

Location-based interactions

Geolocation (this Website)

This Website may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorisation has been provided, the User's location data may be tracked by this Website.

Personal Data processed: coarse location.

Category of Personal Information collected according to CCPA: geolocation data.

This processing constitutes:

- a Sale in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana
- a Sharing in California
- Targeted Advertising in Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana

Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

SendinBlue Email (SendinBlue SAS)

SendinBlue is an email address management and message sending service provided by SendinBlue SAS.

Personal Data processed: email address; Trackers; Usage Data.

Place of processing: France – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Managing data collection and online surveys

This type of service allows this Website to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depend on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

Hotjar surveys (Hotjar Ltd.)

Hotjar surveys is a survey builder and data collection platform provided by Hotjar Ltd.

Hotjar surveys may use cookies to track User behaviour. Users can Opt-Out of Hotjar surveys cookie tracking by visiting this opt-out page.

Hotjar surveys respects the Do Not Track option available in most modern browsers that, if activated, sends a special signal to stop tracking User activity. Users can find more information on how to enable Do Not Track for each supported browser here.

Personal Data processed: Usage Data.

Place of processing: Malta – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

Managing support and contact requests

This type of service allows this Website to manage support and contact requests received via email or by other means, such as the contact form.

The Personal Data processed depend on the information provided by the User in the messages and the means used for communication (e.g. email address).

Zendesk (Zendesk, Inc.)

Zendesk is a support and contact request management service provided by Zendesk Inc.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

• a Sale in California

Platform services and hosting

These services have the purpose of hosting and running key components of this Website, therefore allowing the provision of this Website from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

WordPress.com

WordPress.com is a platform provided by Automattic Inc. or by Aut O'Mattic A8C Ireland Ltd., depending on how the Owner manages the Data processing, that allows the Owner to build, run and host this Website.

Personal Data processed: email address; first name; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

Registration and authentication

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Website will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

Google OAuth (Google Ireland Limited)

Google OAuth is a registration and authentication service provided by Google Ireland Limited and is connected to the Google network.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: identifiers.

This processing constitutes:

• a Sale in the United States

Registration and authentication provided directly by this Website

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

Direct registration (this Website)

The User registers by filling out the registration form and providing the Personal Data directly to this Website.

Personal Data processed: billing address; city; company name; country; email address; first name; house number; last name; password; phone number; physical address; Tax ID; VAT Number; ZIP/Postal code.

Category of Personal Information collected according to CCPA: identifiers; commercial information.

This processing constitutes:

Remarketing and behavioural targeting

This type of service allows this Website and its partners to inform, optimise and serve advertising based on past use of this Website by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioural targeting activity.

Some services offer a remarketing option based on email address lists.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Facebook Remarketing (Meta Platforms Ireland Limited)

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms Ireland Limited that connects the activity of this Website with the Facebook advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy – Opt Out.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Facebook Custom Audience (Meta Platforms Ireland Limited)

Facebook Custom Audience is a remarketing and behavioural targeting service provided by Meta Platforms Ireland Limited that connects the activity of this Website with the Facebook advertising network.

Users can opt out of Facebook's use of Trackers for ads personalisation by visiting this opt-out page.

Personal Data processed: email address; Trackers.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Category of Personal Information collected according to CCPA: identifiers; internet information.

This processing constitutes:

- a Sale in California
- a Sharing in California

Google Ads Remarketing (Google Ireland Limited)

Google Ads Remarketing is a remarketing and behavioural targeting service provided by Google Ireland Limited that connects the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie.

In order to understand Google's use of Data, consult Google's partner policy.

Users can opt out of Google's use of Trackers for ads personalisation by visiting Google's Ads Settings.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out.</u>

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

- · a Sale in California
- a Sharing in California

TikTok Remarketing (TikTok Information Technologies UK Limited)

TikTok Remarketing is a remarketing and behavioural targeting service provided by TikTok Information Technologies UK Limited that connects the activity of this Website with the TikTok advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United Kingdom – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information.

Spam and bots protection

This type of service analyses the traffic of this Website, potentially containing Users' Personal Data, with the purpose of filtering it from unwanted parts of traffic, messages and content that are recognised as spam or protecting it from malicious bots activities.

Google reCAPTCHA

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>; Ireland – <u>Privacy Policy</u>.

Category of Personal Information collected according to CCPA: internet information; inferred information.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Website in a centralised fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

This processing constitutes:

Traffic optimisation and distribution

This type of service allows this Website to distribute their content using servers located across different countries and to optimise their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Website and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimisation and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through this Website, i.e., communication between this Website and the User's browser, while also allowing analytical data from this Website to be collected.

Personal Data processed: Trackers.

Place of processing: United States – Privacy Policy.

Category of Personal Information collected according to CCPA: internet information.

User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Website, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Website. Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Website.

Brevo marketing automation (SendinBlue SAS)

Brevo marketing automation is a User database management service provided by SendinBlue SAS.

Personal Data processed: email address; Trackers; Usage Data.

Place of processing: France – Privacy Policy.

Category of Personal Information collected according to CCPA: identifiers; internet information.

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Further information about the processing of Personal Data

Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery. The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Website depends on the payment system used.

Cookie Policy

This Website uses Trackers. To learn more, Users may consult the Cookie Policy.

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner:
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a
 structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another
 controller without any hindrance.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organisation governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Further information for Users in the United States

This part of the document integrates with and supplements the information contained in the rest of the privacy policy and is provided by the business running this Website and, if the case may be, its parent, subsidiaries and affiliates (for the purposes of this section referred to collectively as "we", "us", "our").

The information contained in this section applies to all Users (Users are referred to below, simply as "you", "your", "yours"), who are residents in the following states: California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana.

For such Users, this information supersedes any other possibly divergent or conflicting provisions contained in the privacy policy.

This part of the document uses the term Personal Information (and Sensitive Personal Information).

Notice at collection

The following Notice at collection provides you with timely notice about the **categories of Personal Information collected or disclosed in the past 12 months** so that you can exercise meaningful control over our use of that Information.

While such categorization of Personal Information is mainly based on California privacy laws, it can also be helpful for anyone who is not a California resident to get a general idea of what types of Personal Information are collected.

Identifiers

Personal Information collected or disclosed: phone number, first name, last name, physical address, country, email address, Trackers, Usage Data, purchase history, billing address, various types of Data as specified in the privacy policy of the service, company name, ZIP/Postal code, city, house number, various types of Data, launches, number of sessions, session duration, scroll-to-page interactions, mouse movements, scroll position, keypress events, clicks, session statistics, page views, interaction events, page events, date of birth, IP address, device information, app information, device logs, operating systems, browser information, language, geographic position, address, geography/region, coarse location, positional information, state, province, county, latitude (of city), longitude (of city), metro area, shipping address, data relating to the point of sale, in-app purchases, invoicing information, product interaction, order ID, User ID, identification document

Sensitive Personal Information collected or disclosed i: payment info, password, VAT Number, Tax ID

Purposes:

- · Contacting the User
- Managing contacts and sending messages
- Remarketing and behavioural targeting
- Handling payments
- Interaction with support and feedback platforms
- Platform services and hosting
- Managing support and contact requests
- Further information about Personal Data
- Interaction with live chat platforms
- Registration and authentication
- Registration and authentication provided directly by this Website
- · Heat mapping and session recording
- Interaction with online survey platforms
- Interaction with data collection platforms and other third parties
- User database management

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: 1: Yes

Third-parties: SendinBlue SAS, Meta Platforms Ireland Limited, PayPal Inc., Zendesk, Inc., Automattic Inc., Klarna AB, Apple Inc., Google Ireland Limited, Stripe Inc, Hotjar Ltd., Scalapay S.r.l.

Service providers or contractors: this Website

Internet or other electronic network activity information

Personal Information collected or disclosed: Trackers, email address, Usage Data, device information, browser information, first name, last name, phone number, country, Data communicated while using the service, various types of Data as specified in the privacy policy of the service, various types of Data, answers to questions, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, launches, number of sessions, session duration, scroll-to-page interactions, session statistics, page views, interaction events, page events, date of birth, IP address, app information, device logs, operating systems, language, physical address, geographic position, house number, address, geography/region, coarse location, positional information, city, ZIP/Postal code, state, province, county, latitude (of city), longitude (of city), metro area, billing address, shipping address, data relating to the point of sale, in-app purchases, invoicing information, product interaction, purchase history, order ID, User ID, identification document

Sensitive Personal Information collected or disclosed i: payment info, financial information, Tax ID

Purposes:

- Managing contacts and sending messages
- Remarketing and behavioural targeting
- Advertising
- Analytics
- Tag Management
- Interaction with support and feedback platforms
- Platform services and hosting
- Collection of privacy-related preferences
- Interaction with live chat platforms
- Displaying content from external platforms
- Heat mapping and session recording

- Interaction with online survey platforms
- Interaction with data collection platforms and other third parties
- Managing data collection and online surveys
- Traffic optimisation and distribution
- Spam and bots protection
- User database management
- Handling payments

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: 1: Yes

Third-parties: SendinBlue SAS, Meta Platforms Ireland Limited, Pinterest, Inc., Google Ireland Limited, Zendesk, Inc., Microsoft Corporation, Automattic Inc., iubenda srl, Hotjar Ltd., Vimeo, LLC, Fonticons, Inc., Cloudflare Inc., Google LLC, TikTok Inc., TikTok Information Technologies UK Limited, Currence iDEAL B.V., American Express Company, Scalapay S.r.l.

Commercial information

Personal Information collected or disclosed: first name, last name, email address, purchase history, billing address, phone number, physical address, company name, country, ZIP/Postal code, city, house number, Usage Data, launches, number of sessions, session duration, scroll-to-page interactions, mouse movements, scroll position, keypress events, clicks, session statistics, page views, interaction events, page events, date of birth, IP address, device information, app information, device logs, operating systems, browser information, language, geographic position, address, geography/region, coarse location, positional information, state, province, county, latitude (of city), longitude (of city), metro area, shipping address, data relating to the point of sale, in-app purchases, invoicing information, product interaction, order ID, User ID, identification document

Sensitive Personal Information collected or disclosed : payment info, password, VAT Number, Tax ID

Purposes:

- Handling payments
- Registration and authentication provided directly by this Website

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: II: Yes

Third-parties: PayPal Inc., Apple Inc., Stripe Inc, Google LLC, American Express Company, Scalapay S.r.l., Amazon

Service providers or contractors: this Website

Geolocation data

Personal Information collected or disclosed: coarse location, Usage Data, launches, number of sessions, session duration, scroll-to-page interactions, mouse movements, scroll position, keypress events, clicks, session statistics, page views, interaction events, page events, first name, last name, date of birth, IP address, device information, app information, device logs, operating systems, browser information, language, phone number, email address, physical address, geographic position, house number, address, geography/region, positional information, city, ZIP/Postal code, state, province, county, country, latitude (of city), longitude (of city), metro area, billing address, shipping address, data relating to the point of sale, in-app purchases, invoicing information, product interaction, purchase history, order ID, User ID, identification document

Sensitive Personal Information collected or disclosed : payment info, Tax ID

Purposes:

- Location-based interactions
- Handling payments

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: 1: Yes

Third-parties: Scalapay S.r.l.

Service providers or contractors: this Website

Inferences drawn from other personal information

Personal Information collected or disclosed: Usage Data, Trackers, answers to questions, clicks, keypress events, motion sensor events, mouse movements, scroll position, touch events, launches, number of sessions, session duration, scroll-to-page interactions, session statistics, page views, interaction events, page events, first name, last name, date of birth, IP address, device information, app information, device logs, operating systems, browser information, language, phone number, email address, physical address, geographic position, house number, address, geography/region, coarse location, positional information, city, ZIP/Postal code, state, province, county, country, latitude (of city), longitude (of city), metro area, billing address, shipping address, data relating to the point of sale, in-app purchases, invoicing information, product interaction, purchase history, order ID, User ID, identification document

Sensitive Personal Information collected or disclosed : payment info, Tax ID

Purposes:

- Spam and bots protection
- Handling payments

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: 11: Yes

Third-parties: Google LLC, Scalapay S.r.l.

Personal information

Personal Information collected or disclosed: Usage Data

Sensitive Personal Information collected or disclosed in: financial information

Purposes:

Handling payments

Retention period: for the time necessary to fulfill the purpose

Sold or Shared : Yes

Targeted Advertising: [ii]: Yes

Third-parties: Currence iDEAL B.V.

1 You can read the definitions of these concepts inside the "<u>Definitions and legal references section</u>" of the privacy policy.

To know more about your rights in particular to opt out of certain processing activities and to limit the use of your sensitive personal information ("Limit the Use of My Sensitive Personal Information") you can refer to the "Your privacy rights under US state laws" section of our privacy policy.

For more details on the collection of Personal Information, please read the section "<u>Detailed information on the processing of Personal Data</u>" of our privacy policy.

We won't process your Information for unexpected purposes, or for purposes that are not reasonably necessary to and compatible with the purposes originally disclosed, without your consent.

What are the sources of the Personal Information we collect?

We collect the above-mentioned categories of Personal Information, either directly or indirectly, from you when you use this Website.

For example, you directly provide your Personal Information when you submit requests via any forms on this Website. You also provide Personal Information indirectly when you navigate this Website, as Personal Information about you is automatically observed and collected.

Finally, we may collect your Personal Information from third parties that work with us in connection with the Service or with the functioning of this Website and features thereof.

Your privacy rights under US state laws

You may exercise certain rights regarding your Personal Information. In particular, to the extent permitted by applicable law, you have:

- **the right to access Personal Information: the right to know.** You have the right to request that we confirm whether or not we are processing your Personal Information. You also have the right to access such Personal Information;
- **the right to correct inaccurate Personal Information.** You have the right to request that we correct any inaccurate Personal Information we maintain about you;
- the right to request the deletion of your Personal Information. You have the right to request that we delete any of your Personal Information;
- **the right to obtain a copy of your Personal Information.** We will provide your Personal Information in a portable and usable format that allows you to transfer data easily to another entity provided that this is technically feasible;
- the right to opt out from the Sale of your Personal Information; We will not discriminate against you for exercising your privacy rights.
- the right to non-discrimination.

Additional rights for Users residing in California

In addition to the rights listed above common to all Users in the United States, as a User residing in California, you have

- The right to opt out of the Sharing of your Personal Information for cross-context behavioral advertising;
- The right to request to limit our use or disclosure of your Sensitive Personal Information to only that which is necessary to perform the services or provide the goods, as is reasonably expected by an average consumer. Please note that certain exceptions outlined in the law may apply, such as, when the collection and processing of Sensitive Personal Information is necessary to verify or maintain the quality or safety of our service.

Additional rights for Users residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana

In addition to the rights listed above common to all Users in the United States, as a User residing in Virginia, Colorado, Connecticut, Texas, Oregon, Nevada, Delaware, Iowa, New Hampshire, New Jersey, Nebraska, Tennessee, Minnesota and Montana you have

- The right to opt out of the processing of your personal information for Targeted Advertising or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;
- The right to freely give, deny or withdraw your consent for the processing of your Sensitive Personal Information.

 Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

In Minnesota Users also have the right to obtain a list of the specific third parties to which the controller has disclosed the consumer's personal data

- * Note that in some states like Minnesota you have the following specific rights connected to profiling:
 - The right to question the results of the profiling;
 - The right to be informed of the reason that the profiling resulted in the decision; if feasible
 - The right to be informed of what actions the consumer might have taken to secure a different decision and the actions that the consumer might take to secure a different decision in the future:
 - The right to review personal data used in the profiling;
 - If inaccurate, the right to have the data corrected and the profiling decision reevaluated based on the corrected data;

Additional rights for users residing in Utah and Iowa

In addition to the rights listed above common to all Users in the United States, as a User residing in Utah and Iowa, you have

- The right to opt out of the processing of your Personal Information for Targeted Advertising;
- The right to opt out of the processing of your Sensitive Personal Information. Please note that certain exceptions outlined in the law may apply, such as, but not limited to, when the collection and processing of Sensitive Personal Information is necessary for the provision of a product or service specifically requested by the consumer.

How to exercise your privacy rights under US state laws

To exercise the rights described above, you need to submit your request to us by contacting us via the contact details provided in this document.

For us to respond to your request, we must know who you are. We will not respond to any request if we are unable to verify your identity and therefore confirm the Personal Information in our possession relates to you. You are not required to create an account with us to submit your request. We will use any Personal Information collected from you in connection with the verification of your request solely for verification and shall not further disclose the Personal Information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.

If you are an adult, you can make a request on behalf of a child under your parental authority.

How to exercise your rights to opt out

In addition to what is stated above, to exercise your right to opt-out of Sale or Sharing and Targeted Advertising you can also use the privacy choices link provided on this Website.

If you want to submit requests to opt out of Sale or Sharing and Targeted Advertising activities via a user-enabled **global privacy control**, such as for example the Global Privacy Control ("<u>GPC</u>"), you are free to do so and we will abide by such request in a frictionless manner.

How and when we are expected to handle your request

We will respond to your request without undue delay, but in all cases within the timeframe required by applicable law. Should we need more time, we will explain to you the reasons why, and how much more time we need.

Should we deny your request, we will explain to you the reasons behind our denial (where envisaged by applicable law you may then contact the relevant authority to submit a complaint).

We do not charge a fee to process or respond to your request unless such request is manifestly unfounded or excessive and in all other cases where it is permitted by the applicable law. In such cases, we may charge a reasonable fee or refuse to act on the request. In either case, we will communicate our choices and explain the reasons behind them.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data) / Personal Information (or Information)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Sensitive Personal Information

Sensitive Personal Information means any Personal Information that is not publicly available and reveals information considered sensitive according to the applicable privacy law.

Usage Data

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilised by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

This Website (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Website as described in the relative terms (if available) and on this site/application.

Sale

Sale means any exchange of Personal Information by the Owner to **a third party, for monetary or other valuable consideration**, as defined by the applicable privacy US state law. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the applicable law, does not constitute a Sale of your Personal Information.

Sharing

Sharing means any sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's Personal Information by the business to a **third party for cross-context behavioural advertising**, whether for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioural advertising for the benefit of a business in which no money is exchanged, as defined by the California privacy laws. Please note that the exchange of Personal Information with a service provider pursuant to a written contract that meets the requirements set by the California privacy laws, does not constitute sharing of your Personal Information.

Targeted advertising

Targeted advertising means displaying advertisements to a consumer where the advertisement is selected based on Personal Information obtained from that consumer's activities over time and across nonaffiliated websites or online applications to predict such consumer's preferences or interests, as defined by the applicable privacy US state law.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to this Website, if not stated otherwise within this document.

Latest update: 1 July 2025